

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LISA MENNINGER,

Plaintiff,

v.

PPD DEVELOPMENT, L.P.,

Defendants.

Civil Action No: 1:19-CV-11441-LTS

**PLAINTIFF’S MOTION *IN LIMINE* TO PRECLUDE DEFENDANT’S USE OF  
“VOLUNTARY SELF-IDENTIFICATION OF DISABILITY” FORM**

For the reasons set forth in her accompanying Memorandum in Support of this Motion (“Memorandum”), Plaintiff Lisa Menninger respectfully moves this Court *in limine* to preclude Defendant from using the “Voluntary Self-Identification of Disability” form attached as Exhibit 1 to Plaintiff’s Memorandum, and anything contained therein, at trial. Federal law prohibits Defendant from using the form in this manner; its contents are not relevant to this dispute; and, in any event, the admission of this document into evidence would be confusing to the jury and unduly prejudicial to Dr. Menninger.

Respectfully submitted,  
Plaintiff Lisa Menninger,  
By her attorneys,

*/s/ Hampton M. Watson*

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Attorneys for Plaintiff Lisa Menninger

Date: March 10, 2023

**CERTIFICATE OF SERVICE**

I, Hampton M. Watson, certify that on March 10, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Defendant by electronically serving its counsel of record.

/s/ Hampton M. Watson  
Hampton M. Watson

**LOCAL RULE 7.1 CERTIFICATION**

I, Hampton M. Watson, hereby certify that pursuant to Local Rule 7.1(a)(2), Patrick J. Hannon and I, counsel for Plaintiff, conferred with Patrick M. Curran, Jr., counsel for Defendant, by phone on March 10, 2023 and attempted in good faith to resolve or narrow the issues implicated in this motion prior to its filing, but were not successful in doing so.

/s/ Hampton M. Watson  
Hampton M. Watson